8.0 MITIGATION MONITORING PROGRAM

As the Lead Agency under the CEQA, the CSLC is required to adopt a program for reporting or monitoring regarding the implementation of mitigation measures for this project, if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this EIR. This Lead Agency responsibility originates in Public Resources Code section 21081.6(a) (Findings), and the CEQA Guidelines sections 15091(d) (Findings) and 15097 (Mitigation Monitoring or Reporting).

8.1 MONITORING AUTHORITY

The purpose of a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) is to ensure that measures adopted to mitigate or avoid significant impacts are implemented. A MMCRP can be a working guide to facilitate not only the implementation of mitigation measures by the Project proponent, but also the monitoring, compliance and reporting activities of the CSLC and any monitors it may designate.

The CSLC may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities, and the California Department of Fish and Game (CDFG). The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. The CSLC or its designee(s), however, will ensure that each person delegated any duties or responsibilities are qualified to monitor compliance.

Any mitigation measure study or plan that requires the approval of the CSLC must allow at least 60 days for adequate review time. When a mitigation measure requires that a mitigation program be developed during the design phase of the project, the Applicant must submit the final program to CSLC for review and approval for at least 60 days before construction begins. Other agencies and jurisdictions may require additional review time. It is the responsibility of the environmental monitor assigned to each spread to ensure that appropriate agency reviews and approvals are obtained.

The CSLC or its designee will also ensure that any deviation from the procedures identified under the monitoring program is approved by the CSLC. Any deviation and its correction shall be reported immediately to the CSLC or its designee by the environmental monitor assigned to the construction spread.

8.2 ENFORCEMENT RESPONSIBILITY

The CSLC is responsible for enforcing the procedures adopted for monitoring through the environmental monitor assigned to each construction spread. Any assigned environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CSLC or its designee.

8.3 MITIGATION COMPLIANCE RESPONSIBILITY

The Applicant is responsible for successfully implementing all the mitigation measures in the MMCRP, and is responsible for assuring that these requirements are met by all of its construction contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

8.4 GENERAL MONITORING PROCEDURES

Environmental Monitors

Many of the monitoring procedures will be conducted during the construction phase of the project. The CSLC and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the Applicant. To oversee the monitoring procedures and to ensure success, the environmental monitor assigned to each construction spread must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures, will be taken:

- Procedures to be followed by construction companies hired to do the work will be written into contracts between the Applicant and any construction contractors. Procedures to be followed by construction crews will be written into a separate document that all construction personnel will be asked to sign, denoting agreement.

- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the monitoring program.

- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all mitigation measures requiring their attention.

General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the environmental monitor assigned to the relevant construction spread. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the environmental monitor. A checklist will be developed and maintained by the environmental monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The environmental monitor will note any problems that may occur and take appropriate action to rectify the problems.

Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CSLC or its designee on request.

8.5 MITIGATION MONITORING TABLE

The following sections present the mitigation monitoring and reporting tables for each environmental discipline. Each table lists the following information, by column:

- Impact (impact number, title, and impact class);

- Mitigation Measure (full text of the measure);

- Location (where the impact occurs and the mitigation measure that should be applied);
- Monitoring/reporting action (the action to be taken by the monitor or Lead Agency);
- Effectiveness criteria (how the agency can know if the measure is effective);
- Responsible agency; and
- Timing (before, during, or after construction; during operation, etc.).

Table 8-4.1. Mitigation Monitoring Program - Aesthetic/Visual Resources

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
AVR-1: Onshore construction and abandonment activities could adversely affect daytime and nighttime views in the area.	**AVR-1**: During construction, position all elevated construction lighting downward and/or toward the west and south such that direct views of the light source are not visible from the residence on Costa Azul Drive, or to travelers along Pecho Valley Road within Montaña de Oro State Park. Use the lowest watt bulbs possible, and conduct periodic monitoring of the visual impacts of the lights. Monitoring shall be conducted by the environmental monitor and if necessary will result in recommendations to adjust the location, position, *etc.* of lighting in the Sandspit Beach parking lot throughout the construction period.	Terrestrial segment	Compliance monitoring.	Reduces aesthetic and visual impacts.	CSLC	During construction
AVR-2: Project installation may require trimming or removal of vegetation to access the existing conduit route	**AVR-2a:** AT&T shall trim all woody vegetation in preference to cutting, and shall cut all woody vegetation in preference to bulldozing.	Terrestrial segment	Compliance monitoring.	Reduces aesthetic and visual impacts.	CSLC	During construction
	AVR-2b: Existing ground cover such as grasses, leaves, brush and tree trimmings shall be cleared and piled only to the extent necessary. Slash and limbs shall be disposed of as directed by the appropriate agency official.	Terrestrial segment	Compliance monitoring.	Reduces aesthetic and visual impacts.	CSLC / CDPR / San Luis Obispo County Planning (SLOCP)	During construction
	In addition, implement **MM-TERBIO-3a** and **b**: Oak tree avoidance and certified arborist.					

Table 8-4.2. Mitigation Monitoring Program - Air Quality

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
AQ-1: Vessels used for construction and decommissioning could temporarily exceed daily emission thresholds for ozone precursors within the APCD.	**AQ-1a:** Low-sulfur diesel fuel shall be used in all smaller diesel-powered vessels and in all construction equipment.	Entire alignment	Construction vehicle compliance.	Exhaust emissions are minimized.	San Luis Obispo County APCD	During construction
	AQ-1b: As determined by the San Luis Obispo County APCD, AT&T shall financially contribute to an off-site emission reduction program within the APCD jurisdiction. The amount of the contribution shall be agreed upon by the APCD taking into account the limited duration of cable-laying activities. A description of the emission reduction program and a copy of a receipt for funds committed to the program shall be submitted to the APCD prior to operation of the cable.	Entire alignment	Compliance reporting.	Exhaust emissions mitigation.	San Luis Obispo County APCD	During construction
AQ-2: The Proposed Project would produce greenhouse gas emissions and contribute to climate change.	**MM AQ-2:** The Applicant shall participate in a Carbon Offsets Program and will purchase carbon offsets equivalent to the projected project's GHG emissions to achieve a net zero increase in GHG emissions during the construction phase.	Entire alignment	Compliance reporting.	Exhaust emissions mitigation.	San Luis Obispo County APCD	During construction

Table 8-4.3. Mitigation Monitoring Program - Biological Resources

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
TERBIO-1: Cable installation activities could adversely affect nesting activities of protected migratory birds and raptors.	**TERBIO-Previous MM:** *Construction activity would not take place within 0.5-mile (0.8-km) of identified raptor nesting areas during the period of February 1 through July 15.*	Terrestrial segment	Compliance monitoring	Consistent with requirements stipulated by resource agencies. Confirmation by Environmental Monitor.	SLOCP	During construction
	TERBIO-1a: Initial vegetation removal shall be conducted prior to, or after, the typical migratory bird nesting season (March 1 through August 1) to avoid any potential impact to migratory bird nesting activity. Therefore, initial vegetation clearing and tree trimming along the alignments should be conducted between the months of August and February.	Terrestrial segment	Pre-construction survey	Consistent with requirements stipulated by resource agencies. Confirmation by Environmental Monitor.	USFWS / CDFG	During construction
	TERBIO-1b: If MM TERBIO-1a. is infeasible, pre-construction surveys shall be conducted prior to any vegetation removal to identify any potential bird nesting activity, and: • If active nest sites of bird species protected under the Migratory Bird Treaty Act are observed within the vicinity of the Project site, then the Project shall be modified and/or delayed as necessary to avoid direct take of the identified nests, eggs, and/or young; • If active nest sites of bird species of special concern (e.g., loggerhead shrike, California horned lark, etc.) are observed within the vicinity of the Project site, then CDFG shall be contacted to establish the appropriate buffer around the nest site. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence; and,	Terrestrial segment	Pre-construction surveys and monitoring	Consistent with requirements stipulated by resource agencies. Confirmation by Environmental Monitor	CSLC/ SLOCP/ USFWS / CDFG	Prior to and during construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	• Active nests shall be documented by a qualified biologist and a letter-report shall be submitted to the State Lands Commission (Lead Agency), County and to the USFWS and CDFG, documenting Project compliance with the MBTA and applicable Project mitigation measures.					
TERBIO-2: Construction activities could potentially adversely affect special-status plant and wildlife species occurring in the Project area.	**TERBIO-2:** Previous Mitigation Measure from 1991 County Coastal Development Permit (D900110D): **Mitigation Monitoring** *1. Prior to commencing construction of each phase the Applicant shall retain a mitigation monitor approved by the County Environmental Coordinator. The mitigation monitor shall submit a monitoring Plan to the Environmental Coordinator prior to construction for review and approval* ***Staking of Disturbance Areas*** *2. Prior to commencing construction activities or any clearing in preparation for construction staging, for each phase, the Applicant shall stake with lath and flag all areas proposed for disturbance to construction control lines. Any disturbance outside of these areas shall be prohibited and construction crews shall be so informed.* ***Clearance and Inspection*** *3. Prior to commencing construction activities or any clearing in preparation for construction staging, the Applicant shall obtain a letter of release from the County Environmental Coordinator after field inspection of construction control staking by the Environmental Coordinator, State Parks and the mitigation monitor.*	Terrestrial segment	Pre-construction activities and Compliance monitoring	Consistent with requirements stipulated by resource agencies. Confirmation by Environmental Monitor.	SLOCP / USFWS / CDFG / NOAA	Prior to and during construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	Mitigation Measures included in the Project by AT&T ***Access and Transportation*** *4. When providing access to fiber optic cable right of way, the stream and any washes would be crossed at existing roads or bridges. Any construction activity in a perennial stream would be prohibited unless specifically allowed by the appropriate agency official or the California Department of Fish and Game Enforcement Representative. All stream channels and washes would be returned to their natural state. California Department of Fish and Game stream alteration agreement Section 1601 and 1603 permits would control and stipulate construction procedures at stream crossings in California. All streams would be crossed between June 1 and October 15, except where prior written permission has been granted by the state and federal representatives.* ***Clearing and Site Preparation*** *5. Sidehill cuts would be kept to a minimum to ensure resource protection and a safe and stable plan for efficient equipment use. The appropriate agency official (i.e., County and/or County compliance monitor) would provide assistance and would approve sidehill cuts prior to construction.* *6. Existing ground cover such as grasses, leaves, brush, and tree trimmings would be cleared and piled only to the extent necessary. Slash and limbs would be disposed of as directed by the appropriate agency official (i.e., County and/or County compliance monitor).*					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	7. Trees and shrubs on the right of way that are not cleared would be protected from damage during construction. The bulldozers would maintain their blade in a raised position except at areas designated for clearing, such as bore pits, manholes, splice boxes and washes. *8. AT&T would trim all woody vegetation in preference to cutting and would cut all woody vegetation in preference to bulldozing.* ***Safety/Health*** *9. Care would be taken to avoid lubricant and fuel spills and other types of pollution in all areas including streams and other water bodies and in their immediate drainage areas. All spills and trash would be cleaned up immediately.* *10. Engine oil changed would be contained in suitable containers and disposed of as refuse.* *11. Construction equipment would not be refueled or serviced within stream channels.* *12. Garbage and other refuse would be disposed of in an authorized disposal site or landfill.* *13. Construction sites would be maintained in a sanitary condition at all times; waste materials at those sites would be disposed of promptly at an appropriate waste disposal site. "Waste" means all discarded matter including human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.* ***Threatened or Endangered Plants and Animals*** *14. Field surveys would be conducted for state and federal listed species potentially present along the route. Where*					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	appropriate and necessary, site-specific mitigation would be developed and approved by the land management agencies, U.S. Fish and Wildlife Service, and California Department of Fish and Game. Field work for identification of plant species would be done before construction and would be scheduled to coincide with known flowering periods and/or during periods of phenological development necessary to identify the plant species of concern. ***Stream Crossings, Wetlands, and Fisheries*** *15. Where the right of way crosses steams, the banks would be stabilized to prevent erosion. Construction techniques would minimize damage to shorelines, recreational areas, and fish and wildlife habitat.* *16. During construction activities near streams, sedimentation (detention) basins and/or straw bale or fabric filters will be constructed to prevent suspended sediments from reaching downstream watercourses or lakes, as required by the California Department of Fish and Game.* *17. Disturbance to riparian vegetation and wetlands would be minimized by avoidance where possible. Approaches to streams would require selective clearing of vegetation subject to California Fish and Game authorization. No mature riparian trees would be removed.* ***General Mitigation Measures Applying to All Routes and Improvements*** *18. Prior to commencement of construction activities, the Applicant shall be required to clearly mark all of the trees to be removed during construction as well as any trees that will be trimmed. In the case of manzanita, the marking can be*					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	accomplished by stringing colored surveyors tape to denote the areas where plants will be affected. *19. Any oak trees, or manzanita that are within ten feet of an area to be graded, not including those to be removed shall be temporarily marked for protection (e.g., flagged with a different color surveyors tape). The purpose of the marking is to act as a reminder to the construction crew that these areas are not to be disturbed during grading. Marking shall be completed prior to commencement of any grading operations within the affected segment of the line (e.g., the rim trail).* ***SLO Junction to Clark Valley Road*** *20. In areas of coastal scrub and Arroyo de la Cruz manzanita, the route shall follow existing roads or trails as closely as possible to reduce vegetation removal. Revegetation shall be with fast growing herbs and shall include shrubs native to the local coastal scrub community.* *21. In areas of chaparral, construction shall follow the existing road, and disturb the vegetation along the side as little as possible.* ***Clark Valley Road to Los Osos Creek*** *22. The existing road west of Clark Valley Road shall be followed where feasible to avoid the oaks and shrubs.* *23. All Morro manzanitas along the route shall be flagged and avoided where possible.* ***0 2-Mile West of the Eastern Boundary of Montaña de Oro State park to Hazard Canyon Road*** *24. Where the Rim Trail is wide, no brush removal should be required and significant disruption to the root systems can be avoided. Trimming of manzanita along the*					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	side of the trail may be required but shall be kept to a minimum by following proper pruning procedures. **General Measures** **MM TERBIO-2a.** Prior to construction, an agency-approved biological monitor shall conduct a worker orientation program that includes information on and emphasizes the presence of all special-status species within the Project site, identification, their habitat requirements, and applicable regulatory policies and provisions regarding their protection, and measures being implemented to avoid and/or minimize impacts for all construction contractors (site supervisors, equipment operators and laborers); **MM TERBIO-2b.** All construction monitoring shall be conducted at a frequency and duration specified by the appropriate regulatory agency(s) (*e.g.*, County, CDFG, USFWS, and NOAA Fisheries) in consultation with AT&T. This consultation shall include appropriate Project authorization from the USFWS (*i.e.*, approved Incidental Take Permit / Habitat Conservation Plan) relative to impacts to the federally-listed Morro shoulderband snail; **MM TERBIO-2c.** In accordance with resource agency guidance, exclusionary fencing shall be erected at the boundaries of equipment staging areas to preclude equipment and human intrusion into adjacent habitats with emphasis on protection of areas containing special-status species (*i.e.*, coastal dune scrub, annual grassland, *etc*.). The exact location of exclusionary fencing for each staging area shall be determined by an agency-approved biological monitor. The fencing shall remain in place throughout the construction phase of the Project; **MM TERBIO-2d.** At no time shall any night-time operations and/or construction activities					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	be allowed along the terrestrial cable route from manholes 109F to 4.5. Any required night-time equipment lighting within the Montaña de Oro AT&T Parking Lot to facilitate the Shore-End Segment cable pull and/or within the AT&T Cable Station shall be shielded away from adjacent wildlife habitat areas and pointed downward to minimize lighting/glare impacts to wildlife; and, **MM TERBIO-2e.** AT&T or its construction contractor shall prepare and implement a Spill Prevention and Contingency Plan that includes provisions for avoiding and/or minimizing impacts to sensitive onshore habitat areas, wetlands and waterways of the Project area (*i.e.*, Los Osos Creek and associated tributaries) due to spills during Project implementation. Specifically, the plan shall include but not be limited to the following provisions: • All equipment fueling shall be conducted within the designated staging areas of the Project site. At no time shall any equipment fueling be conducted within 50 feet (15 m) of any wetland and/or existing waterway; • An overview of the containment measures to appropriately store and contain all fuels and associated petroleum products during the Project shall be included in the plan. This shall include specific provisions for equipment staging areas, such as the need for drip pans underneath all parked equipment and designated storage areas for fuel dispensing equipment with visqueen lining and secondary containment; and, • A description of the response equipment that will be on-site during construction and exact procedures for responding to any inadvertent spills including miscellaneous fuel and/or lubricant spills from construction equipment and vehicles during operations. Final					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	specifications of the Spill Prevention and Contingency Plan shall be reviewed and approved by the CSLC, County and CDFG prior to project implementation. **Additional Protective Measures for Special-Status Wildlife** **MM TERBIO-2f.** Prior to installation of the terrestrial cable route, AT&T shall provide an approved USFWS Incidental Take Permit (ITP) and Habitat Conservation Plan (HCP) that identifies the conservation measures that AT&T agrees to implement to avoid and/or minimize impacts to Morro shoulderband snail during Project operations. The ITP/HCP will document methods of relocation of Morro shoulderband snails from work areas and mitigating temporary impacts to Morro shoulderband snail critical habitat elements (*i.e.,* coastal dune scrub). This shall include a letter of agreement from State Parks approving the final provisions of the proposed Morro shoulderband snail mitigation site within Montaña de Oro State Park as illustrated on Figure 4.3-1. All measures of the HCP specific to the Project shall become Conditions of Approval. **MM TERBIO-2g.** Prior to the disturbance of potentially suitable habitat areas (manholes 109F to 96F and Rim Trail), a USFWS-approved biologist shall survey for, collect, and relocate any Morro shoulderband snails found within the Project area to suitable on-site or off-site habitat areas not planned for disturbance. USFWS authorization shall be required for this activity (*i.e.*, approved Incidental Take Permit / Habitat Conservation Plan). **MM TERBIO-2h.** A CDFG-approved biologist shall conduct pre-construction surveys to determine presence/absence of California horned lizard within and in areas adjacent to chaparral and/or scrub habitats with emphasis					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	from manholes 109F to 82F. Surveys shall only be required during the active period of California horned lizards (generally April through September). If California horned lizards are identified adjacent to and/or within work areas, then hand rakes or an equivalent shall be utilized by biological monitors to scarify the ground surface and encourage the horned lizards (and other wildlife) to vacate the immediate area prior to construction. As necessary, the agency-approved biological monitor shall physically relocate California horned lizard to suitable habitat located outside the construction zone. Exact procedures and protocols for relocation shall be agreed to during pre-project consultation with CDFG; **MM TERBIO-2i.** A USFWS and CDFG-approved biological monitor shall be on-site during all vegetation clearing and periodically monitor the Project site during construction activities to inspect protective fencing, equipment staging areas, and physically relocate/remove any special-status wildlife species entering the construction zone (*i.e.*, Morro shoulderband snail, California horned lizard, *etc*.). All special-status species shall be relocated to suitable habitat located outside the construction zone by a qualified biologist. Exact procedures and protocols for relocation shall be agreed to during pre-Project consultation with USFWS and CDFG; **MM TERBIO-2j.** Prior to each required crossing of Los Osos Creek and associated drainages by Project vehicles and equipment, a CDFG-approved biologist shall conduct a focused pre-activity survey of the proposed crossing including a buffer of approximately 50 feet (15 m) upstream and downstream of the crossing to determine presence/absence of aquatic and semi-aquatic special-status species including but not limited to steelhead trout, California red-legged frog, southwestern					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	pond turtle, and two-striped garter snake. All special-status species within and/or immediately adjacent to the crossing shall be relocated to suitable habitat located outside the roadway by a qualified biologist. Exact procedures and protocols for relocation of species of concern (*e.g.,* southwestern pond turtle, two-striped garter snake, *etc.*) shall be agreed to during pre-project consultation with CDFG. At no time shall any federally-listed species (*e.g.,* steelhead trout, California red-legged frog, *etc.*) be relocated from the crossings without prior authorization from the NMFS and/or USFWS. **MM TERBIO-2k.** During all construction activities, domestic pets shall not be allowed within the construction area to minimize the potential for wildlife harassment.					
TERBIO-3: The proposed Project has the potential to result in permanent loss and/or long-term degradation and fragmentation of natural habitats including sensitive plant communities, which provide forage, cover, and breeding elements for several wildlife taxa, including special-status species	**TERBIO-3:** Previous Mitigation Measure from 1991 County Coastal Development Permit (D900110D): **General Measures** 1. Standard procedures for the proposed fiber optic cable project would include implementation of erosion control and revegetation measures to ensure that lands disturbed by construction activities would be restored to a stable, productive, and aesthetically acceptable condition. 2. Detailed site-specific restoration and reclamation plans would be developed under the direction of the appropriate agency official. Because the proposed right of way is composed of many types of terrain, soils, water, bedrock, vegetation, land uses, and climatic conditions, AT&T would include sets of techniques and measures tailored to each condition encountered. Site-specific erosion control, re-vegetation, and restoration measures	Entire alignment	Compliance monitoring	Reduces damage to oak trees.	SLOCP / USFWS / CDFG	Before and during construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	would be implemented under the direction of the appropriate agency official. 3. During construction of the Project, an AT&T representative would provide: a) liaison with the appropriate agency officials; b) expertise to direct applicable restoration procedure when special conditions are encountered without causing construction delays; and c) favorable public relations. 4. General erosion control restoration measures are applicable to the following areas: • seasonal restrictions for construction phases; • right-of-way and site clearing; • plowing, rock sawing. or trenching, and preservation of topsoil; • backfilling and grading; • land preparation and cultivation; • revegetation, and; • maintenance and monitoring. 5. Actual construction activities would immediately follow clearing operations. Rehabilitation and revegetation would immediately follow construction operations, especially in areas of soil that are highly susceptible to wind or water erosion and/or in other special areas. 6. AT&T would conduct all activities associated with the Project in a manner that would avoid or minimize degradation of air, land, and water quality. In the construction, operation, maintenance, and abandonment of the Project, AT&T would perform its activities in accordance with applicable air and water quality standards related facility siting standards and related plans of implementation, including but not limited to, the Clean Air Act, as amended (42 USC 1321).					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	7. All design material and construction, operation, maintenance and termination practices would be in accordance with safe and proven engineering practices. • Specific Resource/Activity Measures • Access and Transportation 8. Design and construction of all temporary, reconstructed, and newly constructed roads would ensure proper drainage, minimize soil erosion, and preserve topsoil. The design would include clearing work, rehabilitation, and use and maintenance agreements associated with transportation needs. 9. Construction-related traffic would be restricted to routes approved by the appropriate agency official. New access roads or cross-country vehicle travel would not be permitted unless prior written approval was given by the appropriate agency official. Temporary roads used by AT&T would be rehabilitated when construction activities were completed, as approved by the appropriate agency official. 10. Where possible, the right of way itself would be used as an access road during the construction period. The Department of Parks and Recreation would require that the access roads paralleling the fiber optic cable be closed and vegetative cover reestablished after construction is completed. 11. As a general rule, no overland access to the right of way would be permitted. When necessary, overland access would be specified in lieu of road construction or reconstruction.					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	12. All temporary roads would be closed and areas restored without undue delay or maintained as specified in the land use authorizations. 13. All damaged streets would be repaired to the permit requirements of the governing agency (e.g., city or county road or street cut permits), or otherwise to an equal or better condition. **Seasonal Restrictions** 14. During adverse weather conditions, as determined by the Authorized Officer, stop and start orders would be issued to prevent rutting or excessive tracking of soil and deterioration of vegetation in the right of way area. **Clearing and Site Preparation** 15. Existing ground cover such as grasses, leaves, brush, and tree trimmings would be cleared and piled only to the extent necessary. Slash and limbs would be disposed of as directed by the appropriate agency official. **Rehabilitation and Revegetation** 16. In strongly sloping and steep terrain (greater than 28 percent slope), erosion control structures such as water bars, diversion channels, and terraces would be constructed to divert water away from the fiber optic cable trench and reduce soil erosion along the right of way and other adjoining areas disturbed during construction, as specified and approved. 17. AT&T would dispose of materials unsuitable for backfilling or excess backfill material at approved locations. 18. Temporary work space areas used at stream and highway crossings and other special sites would be restored to approximate preconstruction conditions.					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	19. Suitable mulches and other soil stabilizing practices would be used on all regraded and topsoiled areas to protect unvegetated soil from wind and water erosion and to improve water absorption. 20. Rock mulches would be used in steep-sloping rock outcrop areas and low precipitation areas to reduce erosion and promote vegetation growth. 21. AT&T would revegetate disturbed areas where necessary, using agreed upon methods suitable for the disturbed locations. 22. Seed would be planted by drilling, broadcasting or hydroseeding. 23. Seeding would be done when seasonal or weather conditions are most favorable. 24. Only species adapted to local soil and climatic conditions would be used. Generally these would be native species. However, introduced species may be considered for specific conditions. 25. Seed mixtures would be planted in the amount specified in pounds of pure live seed/acre where necessary. There would be no primary or secondary noxious weeds in the seed mixture. Seed would be tested, and the viability testing of seed would be done in accordance with state laws and within 9 months prior to purchase. Commercial seed would be either certified or registered seed. For drilling, seed would be planted using a drill equipped with a depth regulator to ensure proper depth of planting where drilling was possible. The seed mixture would be evenly and uniformly planted over the disturbed area (smaller/heavier seeds have a tendency to drop to the bottom of the drill and be planted first). AT&T would					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	take appropriate measures to ensure this did not occur. Where drilling is not possible, seed would be broadcast and the area raked or chained to cover the seed. When broadcasting the seed, the pounds per acre would be doubled. The seeding would be repeated until a satisfactory stand was established. • Drilling would be used where topography and soil conditions allow operation of equipment to meet the seeding requirements of the species being planted. • Broadcast seeding would be used for inaccessible or small areas. • Hydroseeding would be done in critical areas. 26. Waterbars may be constructed to: 1) simulate the imaginary contour lines of the slope (ideally with a grade of 0 or 2 percent); 2) drain away from the disturbed area; and 3) begin and end in vegetation or rock whenever possible. 27. AT&T would trim all woody vegetation in preference to cutting and would cut all woody vegetation in preference to bulldozing. 28. The reestablishment of vegetative cover as well as watershed stabilization measures would be scheduled during the ongoing working season and prior to the succeeding winter season. 29. Temporary measures could include the following: • Constructing temporary breakers at proper intervals on slopes and access roads to control runoff whenever applicable;					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	• Installing silt screens as silt barriers in swales, at the base of small slopes, and in other areas subject to sedimentation from low velocity runoff; • Temporarily seeding critical areas such as road cuts and stream banks with an approved grass seed mixture; • Mulching slopes; and, • Protecting drains with barriers. **Visual Resources** 30. Trees that must be removed would be cut. Trees with trunks outside the 15-foot (4.6 meters) wide area of disturbance would not be cut, but would only have overhanging limbs removed by cutting, with the tree to remain. Limbs which are removed would be cut flush with the tree trunk to avoid leaving unsightly stubs. Trees and shrubs in the right of way that are not cleared would be protected from damage during construction. **Soils and Erosion** 31. Erosion Control East of Pecho Valley Road. Potential increased erosion in the segment underlain by sand east of Pecho Valley Road along Rim Trail shall be controlled by providing waterbars at intervals no greater than 200 feet (61 m). Providing periodic diversion of runoff from the trail will reduce the rate of erosion now occurring along this segment. **Biological Resources** 32. Revegetation Plan. The Applicant shall prepare a revegetation plan for all disturbed areas of the Project. A qualified botanist acceptable to the county and the Department of Parks and Recreation shall review and make recommendations regarding the revegetation plan before					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	implementation. The revegetation plan shall include the following measures: a. General Mitigation Measures applying to all routes and improvements. 1) Any revegetation shall utilize seeds or cuttings collected from adjacent areas; 2) As practicable, revegetation shall occur within the same vicinity as the vegetation to be removed. If it is not possible to revegetate in the same vicinity, then the revegetation shall occur at designated locations as stipulated in the revegetation plan. Unless specified, eucalyptus and other non-native species need not be replanted, but shall be replaced with native species as specified in the revegetation plan; 3) Arroyo de la Cruz manzanita, Morro manzanita and coast live oak trees shall be replaced at a ratio of 5:1, with plants established from cuttings or seeds collected from the local population. The revegetation areas for manzanita shall be: (1) in cleared areas adjacent to the right of way or within the right of way if it is not used for maintenance; or (2), in other areas designated by the environmental monitor (such as in areas that have been cleared of eucalyptus, trails to be abandoned or other suitable areas requiring revegetation); 4) The revegetation plan shall include the following: • Species to be replanted and source of seeds and plants to be used;					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	• Location of the revegetation areas; • Timetable for revegetation; • Method of revegetation (such as the size of plants, soil amendments, special techniques needed to ensure successful replanting, etc.); • Irrigation method where needed; • Method to verify that replanting has been successful, and; • The standard county procedures for oak tree preservation shall be included. 5) Prior to commencement of construction activities, the Applicant shall be required to clearly mark all of the trees to be removed during construction as well as any trees that will be trimmed. In the case of manzanita, the marking shall be accomplished by stringing colored surveyors tape to denote the areas where plants will be affected; 6) Any oak trees or manzanita that are within ten feet of an area to be graded, not including those to be removed shall be temporarily marked for protection (e.g., flagged with a different color surveyors tape). The purpose of the marking is to act as a reminder to the construction crew that these areas are not to be disturbed during grading. Marking shall be completed prior to commencement of any grading operations within the affected segment of the line (e.g., the rim trail); 7) During construction, the operation of heavy equipment shall avoid the					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	area within the driplines of oaks. Such equipment shall not be parked under these trees in order to prevent oily residue from leaking into the root zone and to avoid soil compaction in this area; 8) All trenching shall take place outside of the dripline and root zone of all oak trees. Remedial measures ensuring the health of these trees (i.e., pruning to eliminate growth stress) shall also be specified in the revegetation plan. If it is not possible to avoid the driplines of oak trees, the tree shall be considered damaged and shall be replaced as required in item #3 above; 9) The environmental monitor shall record all trees that are impacted by removal cutting and grading. The monitor will be responsible for monitoring the health of the replanted trees until it is determined that they can survive on their own for a minimum period of five years, and; 10) The width of the disturbance necessary for construction shall be kept to a minimum. It should be noted that the applicant shall be required to replace all vegetation removed during construction, specifically with a 5:1 replacement of oak trees and manzanita and revegetation with an appropriate mix of native seeds and plants. If the environmental monitor deems that the width of the disturbance is excessive, work shall cease until it can be determined what the					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	appropriate width should be. AT&T has indicated that the width of disturbance should not exceed 40 feet (12 m) at crossings and in areas of difficult terrain, and would average 30 feet (9 m)along the majority of the line. In areas of sensitive vegetation, it is possible to reduce the width of disturbance to 10 feet (3 m) depending on terrain conditions. b. SLO Junction to Clark Valley Road 1) In areas of coastal scrub and Arroyo de la Cruz manzanita, the route shall follow existing roads or trails as closely as possible to reduce vegetation removal. Revegetation shall be with fast growing herbs and shall include shrubs native to the local coastal scrub community. 2) In areas of chaparral, construction shall follow the existing road, and disturb the vegetation along the side as little as possible. c. Clark Valley Road to Los Osos Creek 1) The existing road west of Clark Valley Road shall be followed where feasible to avoid the oaks and shrubs. 2) All Morro manzanitas along the route shall be flagged and avoided where possible. d. Los Osos Creek Crossing 1) Creek and riparian vegetation shall be disrupted as little as possible at the Los Osos Creek Crossing. The area disturbed shall be revegetated with plants native to the riparian					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	zone as listed in the revegetation plan. Arroyo willows should be included. e. Los Osos Creek Crossing to 0.2 mile (0.3 km) West of the Eastern Boundary of Montaña de Oro State Park 1) The alignment shall follow the existing open pathway through the oaks. All disturbance should be as far away from the trunks as possible and outside of the drip line. f. 0.2 mile (0.3 km) West of the Eastern Boundary of Montaña de Oro State Park to Hazard Canyon Road. 1) Where Rim Trail is wide, no brush removal should be required and significant disruption to the root systems can be avoided. Trimming of manzanitas along the side of the trail may be required but shall be kept to a minimum following proper pruning procedures. **Additional TERBIO-3. Mitigation Measures**: The following mitigation measures are recommended to further reduce or eliminate construction-related impacts to sensitive habitat areas known to occur or with the potential to occur along the terrestrial cable route: **MM TERBIO-3a.** To avoid unnecessary pruning impacts to several oak woodland habitat areas along the right-of-way, the alternative access routes outlined on Figures 4.3-12 and 4.3-13 of the EIR shall be utilized to access manholes 28.5 to 30.5 and 51 during all Project operations. Appropriate use of these alternate access routes would also avoid and/or minimize inadvertent soil compaction impacts to the critical root zones of oak trees at these locations due to temporary access of Project					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	vehicles and equipment. **MM TERBIO-3b.** To further protect and ensure the long-term health of oak woodland habitat throughout the terrestrial cable route ROW, a certified arborist shall be retained by AT&T to perform any necessary trimming of oak tree limbs overhanging equipment access routes. This shall be conducted prior to allowing construction equipment to enter the proposed impact area to avoid and/or minimize the potential for inadvertent damage to oak tree limbs (i.e., equipment, vehicles, etc.). **MM TERBIO-3c**. To ensure that all repaired erosion features along the Rim Trail and any newly created erosion areas due to Project implementation are properly stabilized utilizing the erosion and sedimentation control measures outlined above, all repaired areas shall be monitored during the subsequent rainy season. Specifically, the following measures shall be implemented: • All erosion repair areas (both minor and major) of the terrestrial cable route right-of-way shall be identified and numbered accordingly and illustrated on a site plan for easy reference; • The stabilized erosion features shall be monitored for overall effectiveness during three significant storm events (>1-inch [2.5 cm] rain in a 24-hour period) during the pending subsequent season; • Any erosion control deficiencies including, but not limited to rills, gullies, waterbar(s) failure, and localized slope failures shall be identified and appropriate corrective actions using the measures outlined above shall be discussed in a monitoring report; • Copies of the monitoring report shall be provided to the appropriate regulatory agencies, landowner representatives and					

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	AT&T within 48 hours of erosion feature documentation; • Recommended measures within the report shall then be implemented within 72 hours by an AT&T on-call contractor; and, • Any areas requiring repair will be monitored using these same protocols the following rainy season.					
MARBIO-1: Potential Rock Substrate Disturbance During Pre-Lay Grapnel Survey.	**MM MARBIO-1. Pre-Survey Map.** The CSLC shall be provided with a grapnel survey plan that includes a figure that depicts the areas where the grapnel will be deployed and, within those areas of the marine segment that have rocky seafloor substrate, delineates where the grapnel will not be used.	Marine segment	Pre-construction activity	Reduce hard bottom habitat impacts.	CSLC	Prior to construction
MARBIO-2: Potential Impacts to Rock Substrate During Vessel Anchoring and Nearshore Cable Placement	**MM MARBIO-2a.** Prior to anchoring any vessels, prepare, and have CSLC approve, a detailed anchor plan that shows all proposed anchor locations. Complete a side scan sonar or diver survey within a 100 foot- (31 m) diameter area around all proposed anchor locations and within a 20 foot- (6 m) wide corridor along all proposed anchor line alignments within those areas that have not been similarly surveyed within the past year or where rocky habitat has been previously recorded.	Marine segment	Pre-construction activity	Reduce rock substrate impacts.	CSLC	Prior to construction
	MM MARBIO-2b. To assure that no nearshore rocky substrate is affected, the shore-end cable shall be placed onto sedimentary seafloor. Prior to insertion of the cable, CSLC shall be provided with a figure that depicts seafloor habitat types and bathymetry and the location on the seafloor that the shore-end cable will be placed.	Marine segment	Pre-construction activity	Reduce rock substrate impacts.	CSLC	Prior to construction
MARBIO-3: Damage to Rock Substrate During Cable Laying	**MM MARBIO-3.** A CSLC-approved marine biologist shall be onboard the post-lay ROV survey vessel to observe and record the effects of cable lay operations on the seafloor	Marine segment	Post-construction survey and reporting	Mitigate impacts to hard bottom habitat from cable laying activities.	CSLC	Post construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	substrates and biota in water depths of from 100 to 6,000 feet (31 and 1,830 m). A technical report that includes information on the area (in square meters) and estimated number and species of organisms affected in rocky habitats, shall be prepared and submitted to CSLC. Restoration specifications shall be based on the results of that survey and specified by the CSLC.					
MARBIO-4: Marine Mammal Interaction with Cable Lay, Cable Burial and Support Vessels	**MM MARBIO-4.** A marine wildlife contingency plan for the cable lay and post-lay surveys shall be prepared that will include measures to reduce the chance of vessel/marine mammal interactions within the area most likely to support the most common cetaceans. That plan shall include the provision for NOAA Fisheries-approved marine mammal monitors to be onboard the cable lay, cable burial and support vessels for complete daytime observations during marine construction activities within 50 miles (80 km) of the shore.	Marine segment	Compliance monitoring	Reduce impacts to marine mammals during cable laying activities.	NOAA	Before and During construction
MARBIO-5: Incidental and Accidental Vessel Discharges	**MM-MARBIO-5a. Zero Discharge Policy.** A zero-discharge policy shall be adopted for all Project vessels; no fluids shall be discharged into the marine waters shoreward of the mile-limit specified by U.S. and State of California regulations.	Marine segment	Compliance monitoring	Reduces damage to marine environment.	CSLC	During construction
	MARBIO-5b: An oil spill response and recovery plan shall be prepared. When in California waters and as required by OSPR and OPA-90 regulations, sufficient onboard oil recovery equipment to respond to a specified oil spill shall be maintained. If required, contract arrangements with spill response organizations shall be established and maintained that can respond to an oil spill with the appropriate equipment and within the regulation-specified period.	Marine segment	Pre-construction activity	Reduces possible damage to marine environment.	CDFG-OSPR / USCG / CSLC	Prior to construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
MARBIO- 6: Damage to Rock Substrate During Maintenance and Repairs.	**MM-MARBIO-6:** Prior to initiation of in-water activities, an anchoring plan for all vessels involved in maintenance, repair, and/or abandonment/removal activities shall be submitted to CSLC for approval. If necessary, an anchor-area clearance survey, similar to that recommended in Mitigation Measure MB-2a above, shall be completed.	Marine segment	Compliance monitoring	Reduces damage during maintenance activities.	CSLC	Prior to construction

Table 8-4.4. Mitigation Monitoring Program - Commercial and Recreational Fishing

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Impacts less than significant (Class III).	No proposed mitigation measures.	N/A	N/A	N/A	N/A	N/A

Table 8-4.5. Mitigation Monitoring Program - Cultural Resources

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
CR-1: Certain areas of the Project corridor pass through landscapes known to contain abundant cultural resources (*e.g*. Los Osos).	**CR-1a:** Prior to issuance of construction permits, AT&T will prepare and submit a cultural resources monitoring plan to CSLC and the San Luis Obispo County Department of Planning and Building/Environmental Coordinator. The plan shall be prepared by a qualified archaeologist that is approved by the CSLC and the county. The plan shall address, but not be limited to, monitoring, physical monitoring boundaries (*e.g.*, 100-feet (31 m) each side of a site), site security, protocol for notifying local authorities (*i.e*. Sheriff, Police) should site looting and other illegal activities occur during construction.	Terrestrial segment	Compliance documentation	Consistent with requirements stipulated by resource agencies. Confirmation by Environmental Monitor.	CSLC / SLOCP	Prior to construction
	CR-1b: A pre-construction meeting shall be conducted by a qualified archaeologist to advise the construction crew of conditions to be aware of that may indicate the presence of a significant archaeological site.	Terrestrial segment	Compliance meeting	Reduce possible damage to cultural resources.	CSLC	Prior to construction
	CR-1c: During trenching in the Sandspit Beach parking lot, cultural resource monitoring shall be conducted by a qualified archaeologist and Native American monitor familiar with the resource types potentially present in these locations. The qualified archaeologist shall conduct monitoring activities based on a cultural resources monitoring plan. During work at the staging area and in the vicinity of Manhole MH 89 F, cultural resource monitoring will be conducted by a qualified archaeologist and Native American monitor familiar with the resource types potentially present in these locations. The qualified archaeologist shall conduct monitoring activities based on a cultural resources monitoring plan developed for the Project. Prior to commencement of construction activities, the site boundaries will be marked	Terrestrial segment	Compliance monitoring	Reduce possible damage to cultural resources.	CSLC/ Native American Heritage Commission (NAHC)	During construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	with fencing, the present work areas will be examined for cultural remains, and any artifacts present within work areas will be mapped and collected.					
	CR-1d: Any cultural and/or paleontological resources (historical or prehistoric site or object) discovered by AT&T, or any person working on AT&T's behalf, shall be immediately reported to the appropriate agency official. AT&T shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the appropriate agency official. An evaluation of the discovery would be made by the appropriate agency official to determine actions that will be taken to prevent the loss of significant cultural or scientific values.	Terrestrial segment	Reporting of found materials	Reduce damage to cultural resources.	CSLC	During construction
CR-2: The potential exists for archeological resources or human remains to be found at any time during the Project activities.	**CR-2:** If archaeological resources or human remains are discovered during construction, CSLC and the County shall be notified, and work shall be halted within 150 ft (46 m) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated within 48 hours of discovery, and will be implemented. Human remains must be reported to the Coroner's office. If the human remains are Native American in origin, the Native American Heritage Commission must be notified. A Most Likely Descendant will be appointed by the commission for reburial of the remains.	Terrestrial segment	Compliance monitoring	Reduce possible damage to paleontological and/or cultural resources.	CSLC/ SLOCP/ NAHC	During construction
CR-3: Along areas of the Project corridor there are known cultural resources.	**CR-3:** During construction, the following activities shall be excluded from designated sensitive areas: (1) unnecessary or expansive excavation; (2) staging equipment or machinery on undisturbed or exposed portions of the cultural resource; (3) failure to immediately contain and collect any chemical spills; (4) collection, removal or displacement of any artifacts, ecofacts or other cultural remains; (5) stockpiling of imported soils within the	Terrestrial segment	Map and mark sensitive resources on construction drawings or project maps	Reduce damage to cultural resources.	CSLC	During construction

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	designated sensitive area; (6) removal of native soils outside a sensitive area.					
CR-4: A highly degraded or deteriorated cultural resource (shipwreck) may occur undetected in the Project area buried within unconsolidated sediments, which could be damaged or destroyed during the pre-lay grapnel run or during the cable burial process.	**CR-4a:** Prior to the pre-lay grapnel run and cable installation, a qualified marine archaeologist shall complete an analysis of available side scan sonar and magnetometer data for the cable route between the shoreline and the 6,000 ft (1,830 m) water depth. The analysis shall identify and analyze all magnetic and side scan sonar anomalies that occur in a 0.6 mile (1.0 km) wide corridor centered on the proposed cable route. AT&T will submit the results of that report to the CSLC for approval prior to the pre-lay grapnel run and cable installation.	Marine segment	Review assessment for compliance	Reduce possible damage to unknown shipwrecks.	CSLC	Prior to construction
	CR-4b: Should a previously unknown shipwreck of potential cultural resource value be discovered within the proposed cable corridor as a result of the study required in CR- 6a, the proposed cable route or installation procedures shall be modified to avoid the potentially significant cultural resource.	Marine segment	Compliance monitoring	Reduce possible damage to unknown shipwrecks.	CSLC	During construction
	In addition, implement **MM-MARBIO-5b**: Spill Response and Recovery Plan.					

Table 8-4.6. Mitigation Monitoring Program - Geology and Soils

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
GEO-1: Construction during the wet season has the potential to result in erosion along access roads and at work zones along the cable conduit route.	Implement **WQ-1:** Prepare and Implement Storm Water Pollution Prevention Plan, and **MM-TERBIO-3c:** Erosion Control Monitoring	Terrestrial segment	Prepare and review SWPP	Reduce possible damage related to erosion.	RWQCB / CSLC	Before and during construction

Table 8-4.7. Mitigation Monitoring Program - Hydrology and Water Quality

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
WQ-1: Construction during the wet season has the potential to result in potentially significant surface water quality impacts to sensitive water bodies and wetland areas.	**WQ-1:** Prior to issuance of construction permits, AT&T shall submit evidence of an approved Storm Water Pollution Prevention Plan (SWPPP) covering all aspects of the Project and specifically addressing conditions and measures to be implemented to minimize the effects of erosion and/or a spill of toxic substances. The SWPPP should include but not be limited to spill contingency measures, vehicle and equipment maintenance, and any dewatering activities that become necessary in accessing manholes.	Terrestrial segment	Prepare and review SWPP	Reduce possible damage related to erosion.	RWQCB	Prior to construction
	In addition, implement **MM TERBIO-2e:** Spill Prevention and Contingency Plan, and **MM-TERBIO-3c**: Erosion Control Monitoring.					
WQ-2: A petroleum discharge during construction activities would result in significant impacts to water quality.	**WQ-2 :** Prior to laying any cable, AT&T shall require that the vessel operator prepare and have onboard the lay vessel and other larger construction vessels, an oil spill response plan, approved by the California Office of Spill Prevention and Response, that specifies equipment and actions that will be taken in the event of a petroleum spill.	Terrestrial segment	Prepare plan and review	Reduce effect of a petroleum discharge.	CSLC/ CDFG-OSPR	Prior to construction
WQ-3: Discharge of contaminated water during pipe preparation activities would result in significant impacts to water quality.	**WQ-3 :** Prior to use, AT&T shall conduct chemical analytical testing of water proposed to be utilized for pipe preparation activities to ensure the water quality will not violate Ocean Plan water quality standards. Copies of the water quality analytical testing results shall be submitted to the California State Lands Commission or its environmental monitor and the Regional Water Quality Control Board for review and approval prior to discharge.	Terrestrial segment	Compliance monitoring, and testing	Reduce effect of fresh water discharge.	CSLC/ RWQCB	Prior to construction

Table 8-4.8. Mitigation Monitoring Program - Land Use and Recreation

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
REC-1: The proposed Project could temporarily affect recreational use of the Sandspit Beach parking lot.	**REC-1a:** Prior to cable installation, AT&T shall obtain the approval from the California Department of Parks and Recreation (CDPR) for the scheduling and locating of Project activities at the Sandspit Beach parking lot, incorporating measures to ensure the availability of offsite parking, restrooms, and pedestrian access to the beach during Project activities. AT&T shall submit documentation of the approval to the Executive Officer of the California State Lands Commission (CSLC) prior to Project initiation.	Terrestrial segment	Notification of CDPR.	Reduce impacts to recreational resources at Sandspit Parking Lot	CDPR / CSLC	Prior to construction
	REC-1b: Prior to construction within the Sandspit Beach parking lot AT&T shall coordinate with California Department of Parks and Recreation (CDPR) and the County Department of Public Works (CDPW) to provide signage along Pecho Valley Road redirecting visitors to park at one of the other designated parking areas. In addition, AT&T shall post signage in the Sandspit Beach parking area alerting visitors that the lot will be closed or partially closed, the length of time, and the location of alternative parking areas.	Terrestrial segment	Posting of signage.	Public notification.	CDPR / CDPW	Prior to construction

Table 8-4.9. Mitigation Monitoring Program - Marine Transportation

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Impacts less than significant (Class III)	No proposed mitigation measures.	N/A	N/A	N/N/A	N/A	N/A

Table 8-4.10. Mitigation Monitoring Program - Noise

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
NOI-1: While vessel-specific noise measurements are not available, it is expected that maximum noise levels will be at or near the NOAA-specified harassment levels only within a short distance of the vessel.	**NOI-1:** A marine wildlife contingency plan for the cable lay and post-lay surveys shall be prepared that will include measures to reduce the chance of noise-related impacts to marine mammals within the area most likely to support the most common cetaceans. That plan shall include the provision for NOAA Fisheries-approved marine mammal monitors to be onboard the cable lay, cable burial and support vessels for complete daytime observations during marine construction activities within 50 miles (80 km) of the shore.	Marine segment	Compliance monitoring.	Consistent with requirements stipulated by resource agencies.	NOAA	Before and during construction

Table 8-4.11. Mitigation Monitoring Program - System Safety/Risk of Upset

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
SYS-1: Onshore construction activities will involve the use of vehicles and equipment within sensitive areas. A fuel spill would result in a significant impact to the environment.	**SYS-1a:** All construction vehicles shall be required to carry absorbent materials to be used in the event of fuel or oil leaks or spills. Sufficient quantities of spill containment and clean-up materials shall be stored at the staging areas for clean up of spills during refueling or servicing of equipment. All spills, regardless of size, shall be cleaned up immediately and reported, if required by existing regulations.	Marine segment	Pre-construction activity.	Reduces possible damage to marine environment.	CSLC	Prior to construction
	SYS-1b: All vehicle or equipment repair or fueling shall occur at least 100 feet (31 m) from wetlands and water courses.	Marine segment	Pre-construction activity.	Reduce possible damage to marine environment.	CSLC	During construction.
	SYS-1c: All absorbent material used to clean up leaks and spills shall be disposed of in accordance with applicable hazardous waste regulations	Marine segment	Pre-construction activity.	Reduce possible damage to marine environment.	CSLC	During construction.
SYS-2: An incidental and/or accidental vessel discharge during construction activities would result in significant impacts to water quality.	Implement **MM-MARBIO-5a:** Zero Discharge Policy, and **MM-MARBIO-5b:** Spill Response and Recovery Plan.					

Table 8-4.12. Mitigation Monitoring Program - Transportation and Circulation

Impact	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Impact less than significant (Class III)	No proposed mitigation measures.	N/A	N/A	N/A	N/A	N/A

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